

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTSCIVIL ACTION  
NO. 04-11924-RGS

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 IAN J. BROWN, JAMES BROWN and  
 BARBARA BROWN  
 Plaintiffs

v.

 UNITED STATES OF AMERICA,  
 VERIZON NEW ENGLAND, INC. and  
 BOSTON EDISON COMPANY d/b/a  
 NSTAR ELECTRIC  
 Defendants
 

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**JOINT MOTION TO EXTEND PRE-TRIAL SCHEDULING DEADLINES**

The parties to this case respectfully move this Honorable Court to extend the discovery deadline for a period of ninety (90) days from the date of this Motion and to extend the remaining existing deadlines as indicated below. The parties propose the following extensions:

	<b><u>Existing</u></b>	<b><u>Proposed</u></b>
Non-Expert Discovery Deadline	6/29/06	10/21/06
Plaintiffs' Expert Disclosures Deadline	8/30/06	11/21/06
Defendants' Expert Disclosures Deadline	10/3/06	12/21/06
Expert Depositions Deadline	11/30/06	02/01/07
Dispositive Motions Deadline	01/16/07	03/14/07

In support of this motion, the parties state that they have experienced difficulties in scheduling and coordinating the depositions of out-of-state witnesses within the current discovery period and the existence of an additional out-of-state witness was just discovered by the defendants at a recent deposition in this matter.

The Court has not yet set a date for trial. No party will be prejudiced by the allowance of this motion.

WHEREFORE, the parties respectfully request this Honorable Court allow this motion and extend the deadlines as proposed above.

The Defendant,

Verizon New England, Inc.  
By their attorney,

/s/ Joshua A. Lewin  
William A. Worth, BBO# 544086  
Joshua A. Lewin, BBO# 658299  
Prince, Lobel, Glovsky & Tye LLP  
100 Cambridge Street, Suite 2200  
Boston, MA 02114  
(617) 456-8000

The Defendant,  
Boston Edison Company  
d/b/a NSTAR Electric  
By its attorney,

/s/ Michael K. Callahan  
Michael K. Callahan, BBO# 546660  
NSTAR Electric & Gas Corporation  
800 Boylston Street, 17<sup>th</sup> Floor  
Boston, MA 02109  
(617) 424-2102

Date: July 24, 2006

The Plaintiffs,

By their attorney,

/s/ Scott E. Charnas  
Scott E. Charnas, BBO# 081240  
Manheimer & Charnas, LLP  
210 Commercial Street  
Boston, MA 02109  
(617) 557-4700

The Defendant,  
United States of America,  
By its attorney,

/s/ Damian W. Wilmot  
Damian W. Wilmot  
Assistant US Attorney  
Moakley Federal Courthouse  
One Courthouse Way, Suite 9200  
Boston, MA 02210  
(617) 748-3100

**Certificate of Service**

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on July 24, 2006.

/s/ Joshua A. Lewin